

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 100 (AKH)

THIS DOCUMENT RELATES TO ALL
CASES IN THE 21 MC 100 DOCKET

**CERTIFICATION OF ANDREW J. CARBOY IN RESPONSE TO THE
OBJECTIONS OF THE CITY OF NEW YORK AND OTHER INSURED OF
THE WTC CAPTIVE TO THE ORDERS ACCEPTING THE REPORT OF
SPECIAL COUNSEL AND PROVIDING FOR EFFECTIVENESS OF
SETTLEMENT**

Andrew J. Carboy, an attorney duly admitted to practice law in the State of New York and the Southern District of New York, being duly sworn, deposes and says as follows:

1. I am a member of the law firm of Sullivan Papain Block McGrath & Cannavo P.C. ("Sullivan Papain"), counsel for the Plaintiffs herein, and as such am fully familiar with the facts and circumstances of the within action.

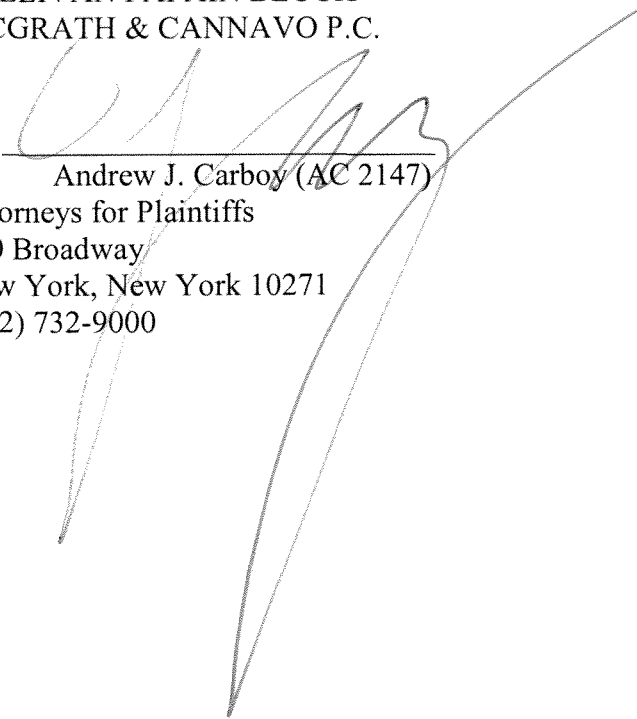
2. Sullivan Papain hereby adopts the February 1, 2011 response of Worby Groner Edelman & Napoli Bern, LLP ("Worby Groner") to the objections of the City of New York and other insureds of the World Trade Center Captive Insurance Company to Orders Accepting Report of Special Counsel Providing for Effectiveness of Settlement. If the subject Orders are vacated or modified, the defendants will benefit from the resolution of over 99% of cases eligible to participate in the Settlement Process Agreement as Amended ("SPA") *without* having to fulfill their obligations to increase the Settlement Amount under SPA Section II A. These obligations must be met.

WHEREFORE, it is respectfully requested that this Court enforce the contested Orders, and deem the challenged dismissals to be in full compliance with the SPA, with the number of plaintiffs on the Eligible Plaintiffs List reduced accordingly.

Dated: New York, New York
February 8, 2011

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
MCGRATH & CANNAVO P.C.

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